



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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JMM:SK  
F. #2013R00948

610 Federal Plaza  
Central Islip, New York 11722

September 19, 2014

**By FedEx & ECF**

Richard D. Haley, Esq.  
One Suffolk Square  
1601 Veterans Memorial Highway  
Suite 425  
Islandia, NY 11749

Joseph Conway, Esq.  
LaRusso & Conway  
300 Old Country Road, Suite 341  
Mineola, NY 11501

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Re: United States v. Philip Kenner & Tommy C. Constantine  
Criminal Docket No. 13-607 (JFB)

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Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the discovery provided on January 16, 2014, January 23, 2014, February 10, 2014, March 6, 2014, March 11, 2014, March 24, 2014, April 11, 2014, May 21, 2014, June 6, 2014, August 6, 2014, August 15, 2014, August 20, 2014, August 22, 2014, August 27, 2014, August 28, 2014, August 29, 2014, September 2, 2014, September 11, 2014 and September 12, 2014. The material below also includes early disclosure of material governed by 18 U.S.C. § 3500. The government renews its request for reciprocal discovery.

Enclosed please find the following:

- Additional text messages sent by Kenner (bates-numbered DS 851-859). The government received these records earlier this week.
- Additional records pertaining to a Hermosa Beach property (bates-numbered HER 133-135).

The government will continue to provide discovery. Please contact me or AUSA James Miskiewicz if you have any questions or requests.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/Saritha Komatireddy  
Saritha Komatireddy  
James M. Miskiewicz  
Assistant U.S. Attorneys  
(631) 715-7825/7841

Enclosures

cc: Clerk of the Court (JFB) (by ECF) (without enclosures)